

**FEDERALLY ENFORCEABLE STATE
OPERATING PERMIT (FESOP)
and ENHANCED NEW SOURCE REVIEW
OFFICE OF AIR MANAGEMENT**

**Autoliv, ASP
4868 East Park 30 Drive
Columbia City, Indiana 46725**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 and 326 IAC 2-1-3.2, as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F183-9405-00029	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates an automobile steering wheel manufacturing plant.

Responsible Official:	Ervin L. Glass
Source Address:	4868 East Park 30 Drive, Columbia City, IN 46725
Mailing Address:	4868 East Park 30 Drive, Columbia City, IN 46725
SIC Code:	3714
County Location:	Whitley
County Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

- (1) four (4) production urethane molding units, identified as UM-1, UM-2, UM-3, and UM-4, each with:
 - (i) maximum capacities of 43 automobile steering wheels per hour;
 - (ii) twelve (12) air atomization spray guns, six guns spray coating a paint blend at a rate of 1.81 gallons per hour and six guns spray coating mold release agent at a rate of 0.70 gallons per hour;
 - (iii) three (3) pairs of molds; and
 - (iv) three (3) exhaust cabinets, controlled by dry filters and exhausting to stacks V-1, V-2, V-3, and V-4, respectively.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (1) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:
 - (a) two (2) at 4.8 million Btu per hour.

- (2) Emissions from research and development activities:
 - (a) one (1) nonproduction research and development urethane molding unit, identified as UM-5, with one (1) exhaust cabinet, controlled by a dry filter, and exhausting to stack V-11.
- (3) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (4) Emissions from a laboratory:
 - (a) one (1) urethane laboratory, with emissions exhausting to vent V-5; and
 - (b) one (1) quality assurance/quality control laboratory, with emissions exhausting to vents V-6, V-7, and V-8.
- (5) Vessels storing lubricating oils, hydraulic oils, machining oils, or machining fluids:
 - (a) one (1) 1000 gallon oil interceptor tank; and
 - (b) two (2) 55 gallon drums of hydraulic oils.
- (6) Other categories with emissions below insignificant thresholds:
 - (a) four (4) pressure vented storage tanks: two (2) of the tanks storing isocyanate and the other two (2) storing polyol resin, each tank having a capacity of 7500 gallons, equipped with either nitrogen blanketing evaporation or compressed dry air control, and emitting less than one (1) ton per year of a single HAP and less than 15 pounds per day of VOC.
- (7) Production related activities, including the application of lubricants as temporary protective coatings.
- (8) Production related activities, including closed heating and cooling systems.
- (9) Repair activities including cleaning or repair of heat exchangers.
- (10) Paved and unpaved roads and parking lots with public access.
- (11) Enclosed systems for conveying plastic raw material and plastic finished goods.
- (12) Activities associated with emergencies, including gasoline, diesel, or natural gas emergency generators:
 - (a) one (1) 0.06 million Btu per hour natural gas emergency generator.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) for a Federally Enforceable State Operating Permit (FESOP).

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

B.2 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2, and 326 IAC 2-7 shall prevail.

B.3 Permit Term [326 IAC 2-8-4(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

B.4 Enforceability [326 IAC 2-8-6]

- (a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM.
- (b) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source's potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.
- (c) Upon request, the Permittee shall also furnish to IDEM, OAM copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAM, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAM may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; and
 - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

- (a) Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was based on continuous or intermittent data;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts as specified in Sections D of this permit, IDEM, OAM, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.13 Preventive Maintenance Plan [326 IAC 1-6-3][326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM.

B.14 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Management, Compliance Section) or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

Failure to notify IDEM, OAM, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAM, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAM, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) An emergency as defined in 326 IAC 2-7-1(12); or
 - (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
 - (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)]
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM determines any of the following:
- (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

- (c) Proceedings by IDEM, OAM, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
 - (1) A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due. [326 IAC 2-5-3]
 - (2) If IDEM, OAM upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]

If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAM takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM, any additional information identified as needed to process the application.

B.18 Permit Amendment or Modification [326 IAC 2-8-10] [326 IAC 2-8-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11 whenever the Permittee seeks to amend or modify this permit.

- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule.

- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-8-11(b)(2)]

Notwithstanding 326 IAC 2-8-11(b)(1)(D)(i) and 326 IAC 2-8-11(c)(1), minor permit modification procedures may be used for modifications of this permit involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches to the extent that such minor permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated by U.S. EPA.

B.20 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-8-15(b)]

The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional condition:

For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.

B.21 Operational Flexibility [326 IAC 2-8-15]

- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAM, in the notices specified in 326 IAC 2-8-15(b), (c)(1), and (d).

- (b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
 - (1) A brief description of the change within the source;
 - (2) The date on which the change will occur;
 - (3) Any change in emissions; and
 - (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) **Emission Trades** [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (d) **Alternative Operating Scenarios** [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAM or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.22 Construction Permit Requirement [326 IAC 2]

Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, modification, construction, or reconstruction shall be approved as required by and in accordance with 326 IAC 2.

B.23 Inspection and Entry [326 IAC 2-8-5(a)(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.
[326 IAC 2-8-5(a)(4)]
 - (1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, nor an authorized representative, may disclose the information unless and until IDEM, OAM makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]
 - (2) The Permittee and IDEM, OAM, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

B.24 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-8-10]

Pursuant to 326 IAC 2-1-6 and 2-8-10:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch, within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current Permittee and the new owner.

- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-8-10. The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) IDEM, OAM shall reserve the right to issue a new permit.

B.25 Annual Fee Payment [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

- (a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

B.26 Enhanced New Source Review [326 IAC 2]

The requirements of the construction permit rules in 326 IAC 2 are satisfied by this permit for any previously unpermitted facilities and such facilities to be constructed within eighteen (18) months after the date of issuance of this permit, as listed in Sections A.2 and A.3.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

- (a) Pursuant to 326 IAC 2-8:
 - (1) The potential to emit any regulated pollutant from the entire source shall be limited to less than one-hundred (100) tons per three hundred sixty-five (365) consecutive day period. This limitation shall also make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable;
 - (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per three hundred sixty-five (365) consecutive day period; and
 - (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per three hundred sixty-five (365) consecutive day period.
- (b) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

- (c) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

- (a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings as determined by 326 IAC 5-1-4,
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]

Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the plan submitted on April 27, 1998. The plan consists of flushing the on-site roads and parking areas with water on an as-needed basis in order to prevent excessive fugitive dust emissions.

C.7 Operation of Equipment [326 IAC 2-8-5(a)(4)]

All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission unit(s) vented to the control equipment are in operation.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

- (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
- (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) Procedures for Asbestos Emission Control
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-8-4(3)]

C.9 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.10 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend compliance schedule an additional ninety (90) days provided the Permittee notify:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.11 Maintenance of Monitoring Equipment [326 IAC 2-8-4(3)(A)(iii)]

- (a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.12 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the applicable requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present in a process in more than the threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

- (a) Submit:
 - (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
 - (2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
 - (3) A verification to IDEM, OAM that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAM that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.14 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-8-4][326 IAC 2-8-5][326 IAC 1-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
 - (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
 - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :
 - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
 - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.

- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
 - (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
 - (3) An automatic measurement was taken when the process was not operating; or
 - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]
[326 IAC 2-8-5]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.16 Monitoring Data Availability

- (a) With the exception of performance tests conducted in accordance with Section C-Performance Testing all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements in (a) above.

C.17 General Record Keeping Requirements [326 IAC 2-8-4(3)][326 IAC 2-8-5]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.

- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.18 General Reporting Requirements [326 IAC 2-8-4(3)(C)]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported.
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.
- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports.
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Stratospheric Ozone Protection

C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156
- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]

four (4) production urethane molding units, identified as UM-1, UM-2, UM-3, and UM-4, each with:

- (i) maximum capacities of 43 automobile steering wheels per hour;
- (ii) twelve (12) air atomization spray guns, six guns spray coating a paint blend at a rate of 1.81 gallons per hour and six guns spray coating mold release agent at a rate of 0.70 gallons per hour;
- (iii) three (3) pairs of molds; and
- (iv) three (3) exhaust cabinets, controlled by dry filters and exhausting to stacks V-1, V-2, V-3, and V-4, respectively.

Emissions Limitation and Standards

D.1.1 BACT Condition

That pursuant to 326 IAC 8-1-6 (General Reduction Requirements),

- (a) The VOC content of the mold cleaner used in the urethane injection molding units shall not exceed 8.30 pounds of VOC per gallon as applied and the VOC content of each ingredient used in the paint blend shall not exceed 6.71 pounds of VOC per gallon as applied.
- (b) The following pollution prevention techniques shall be applied:
 - (i) the method of application shall be air atomization spraying at a maximum pressure of 15 psi;
 - (ii) spraying shall be conducted at a maximum of 18 inches from the molds;
 - (iii) monitoring of the pressure differential across the overspray filter shall be continuous;
 - (iv) the spray guns applying the mold release agent and paint blend are the type that can be cleaned without the need for spraying the solvent into the air;

- (v) all solvent sprayed during cleanup or color changes shall be directed into containers, such containers shall be closed as soon as solvent spraying is complete and the waste solvent shall be disposed of in such a manner that evaporation is minimized;
- (vi) storage containers used to store VOC containing materials shall be kept covered when not in use;
- (vii) cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are closed tightly;
- (viii) proper equipment clean-up and maintenance; and
- (ix) proper testing of spray guns prior to daily use;
- (c) The VOC emissions from the urethane injection molding facility shall be limited to 46.81 tons per 12 month period (10.68 lb/hr), rolled on a monthly basis. This is based on 100% volatilization of the mold release agent, mold cleaner, paint blend, and adhesive.
- (d) Acetone shall remain substituted for the pure methyl ethyl ketone in the paint blend.
- (e) The BACT shall be reopened and reevaluated if another similar operation is going to be installed at the source. BACT will be evaluated for the operations together to determine if the cost of control technology is feasible.

D.1.2 Methyl Ethyl Ketone Limitation (HAP)

- (a) The input methyl ethyl ketone from the four (4) urethane injection molding units shall be limited to 9 tons per 12 month period (2.05 lb/hr), rolled on a monthly basis, based on 100% volatilization. Since there are no HAP emission controls, the MEK input will equal the MEK output for determination purposes. Therefore, the Maximum Achievable Control Technology (MACT) requirements of 326 IAC 2-1-3.4 and the Part 70 Permit requirements of 326 IAC 2-7 will not apply.
- (b) During the first 12 months of operation, the input raw material usage shall be limited such that the total usage divided by the accumulated months of operation shall not exceed the limit specified.

D.1.3 Particulate Matter (PM) Process Operation (326 IAC 6-3)

The PM from the spray guns shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

D.1.4 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.1.5 Testing Requirements [326 IAC 2-8-5(a)(1),(4)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.6 Particulate Matter (PM)

The dry filters for particulate matter overspray control shall be in operation at all times when the spray guns are in operation.

D.1.7 VOC Emissions

Compliance with Condition D.1.1 shall be demonstrated at the end of each month based on the total volatile organic compound usage for the most recent 12 month period.

Compliance Monitoring Requirements

D.1.8 Monitoring

- (a) Monitoring of the pressure differential across the overspray filter shall be continuous while the booth is in operation. Failure to take response steps in accordance with Section C - Compliance Monitoring Requirements, shall be considered a violation of this permit.
- (b) Weekly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. Compliance response for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. Failure to take response steps in accordance with Section C - Compliance Monitoring Requirements, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements

D.1.9 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken daily and monthly and shall be complete and sufficient to establish compliance with the methyl ethyl ketone usage limits, volatile organic compound usage limits, MEK emission limits, and VOC emission limits established in Conditions D.1.1 and D.1.2.
 - (1) The amount of MEK and VOC content of each ingredient. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (2) A log of the dates of use;
 - (3) The volume weighted MEK and VOC content of the ingredients used for each calendar day;

- (4) The cleanup solvent usage for each month;
 - (5) The total MEK and VOC usage for each calendar day and month; and
 - (6) The weight of MEK and VOC emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.10 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1 and D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: Autoliv, ASP
Source Address: 4868 East Park 30 Drive, Columbia City, IN 46725
Mailing Address: 3350 Airport Road, Ogden, UT 84405
FESOP No.: F-183-9405-00029

**This certification shall be included when submitting monitoring, testing reports/results
or other documents as required by this permit.**

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY/DEVIATION OCCURRENCE REPORT**

Source Name: Autoliv, ASP
Source Address: 4868 East Park 30 Drive, Columbia City, IN 46725
Mailing Address: 3350 Airport Road, Ogden, UT 84405
FESOP No.: F-183-9405-00029

This form consists of 2 pages

Page 1 of 2

Check either No. 1 or No.2

- 9** 1. This is an emergency as defined in 326 IAC 2-7-1(12)
CThe Permittee must notify the Office of Air Management (OAM), within four **(4)** business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
CThe Permittee must submit notice in writing or by facsimile within two **(2)** days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
- 9** 2. This is a deviation, reportable per 326 IAC 2-7-5(3)(c)
CThe Permittee must submit notice in writing within ten **(10)** calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency/Deviation:

Describe the cause of the Emergency/Deviation:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

OFFICE OF AIR MANAGEMENT COMPLIANCE DATA SECTION

FESOP Quarterly Report

Source Name: Autoliv, ASP
Source Address: 4868 East Park 30 Drive, Columbia City, IN 46725
Mailing Address: 3350 Airport Road, Ogden, UT 84405
FESOP No.: F-183-9405-00029
Facility: Urethane Injection Molding Facility
Parameter: Methyl Ethyl Ketone
Limit: 9 tons per 12 month period, rolled on a monthly basis

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

OFFICE OF AIR MANAGEMENT COMPLIANCE DATA SECTION

FESOP Quarterly Report

Source Name: Autoliv, ASP
Source Address: 4868 East Park 30 Drive, Columbia City, IN 46725
Mailing Address: 3350 Airport Road, Ogden, UT 84405
FESOP No.: F-183-9405-00029
Facility: Urethane Injection Molding Facility
Parameter: Volatile organic compounds (VOC)
Limit: 46.81 tons per 12 month period, rolled on a monthly basis

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT

COMPLIANCE DATA SECTION

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) QUARTERLY COMPLIANCE MONITORING REPORT

Source Name: Autoliv, ASP
Source Address: 4868 East Park 30 Drive, Columbia City, IN 46725
Mailing Address: 3350 Airport Road, Ogden, UT 84405
FESOP No.: F-183-9405-00029

Months: _____ to _____ Year: _____

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)	Number of Deviations	Date of each Deviation

Form Completed By: _____
Title/Position: _____
Date: _____
Phone: _____

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for a Federally Enforceable State Operating Permit (FESOP) and Enhanced New Source Review (ENSR)

Source Background and Description

Source Name: Autoliv, ASP
Source Location: 4868 East Park 30 Drive, Columbia City, IN 46725
County: Whitley
SIC Code: 3714
Operation Permit No.: F-183-9405-00029
Permit Reviewer: Jon Akin

The Office of Air Management (OAM) has reviewed a Federally Enforceable State Operating Permit application from Autoliv, ASP relating to the operation of an automobile steering wheel manufacturing plant.

New Emission Units and Pollution Control Equipment Requiring ENSR

The application includes information relating to the construction and operation of the following equipment:

- (1) four (4) production urethane molding units, identified as UM-1, UM-2, UM-3, and UM-4, each with:
 - (i) maximum capacities of 43 automobile steering wheels per hour;
 - (ii) two (2) air atomization spray guns, one gun spray coating a paint blend at a rate of 1.81 gallons per hour and one gun spray coating mold release agent at a rate of 0.70 gallons per hour;
 - (iii) three (3) pairs of molds; and
 - (iv) three (3) exhaust cabinets, controlled by dry filters and exhausting to stacks V-1, V-2, V-3, and V-4, respectively.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (1) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:
 - (a) two (2) at 4.8 million Btu per hour.
- (2) Emissions from research and development activities:
 - (a) one (1) nonproduction research and development urethane molding unit, identified as UM-5, with one (1) exhaust cabinet, controlled by a dry filter, and exhausting to stack V-11.

- (3) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (4) Emissions from a laboratory:
 - (a) one (1) urethane laboratory, with emissions exhausting to vent V-5; and
 - (b) one (1) quality assurance/quality control laboratory, with emissions exhausting to vents V-6, V-7, and V-8.
- (5) Vessels storing lubricating oils, hydraulic oils, machining oils, or machining fluids:
 - (a) one (1) 1000 gallon oil interceptor tank; and
 - (b) two (2) 55 gallon drums of hydraulic oils.
- (6) Other categories with emissions below insignificant thresholds:
 - (a) four (4) pressure vented storage tanks: two (2) of the tanks storing isocyanate and the other two (2) storing polyol resin, each tank having a capacity of 7500 gallons, equipped with either nitrogen blanketing evaporation or compressed dry air control, and emitting less than one (1) ton per year of a single HAP and less than 15 pounds per day of VOC.
- (7) Production related activities, including the application of lubricants as temporary protective coatings.
- (8) Production related activities, including closed heating and cooling systems.
- (9) Repair activities including cleaning or repair of heat exchangers.
- (10) Paved and unpaved roads and parking lots with public access.
- (11) Enclosed systems for conveying plastic raw material and plastic finished goods.
- (12) Activities associated with emergencies, including gasoline, diesel, or natural gas emergency generators:
 - (a) one (1) 0.06 million Btu per hour natural gas emergency generator.

Recommendation

The staff recommends to the Commissioner that the Federally Enforceable State Operating Permit (FESOP) be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively incomplete permit application for the purposes of this review was received on January 23, 1998. Additional information received on January 30, 1998, February 17, 1998, and March 6, 1998 makes the permit application administratively complete.

Emission Calculations

The calculations submitted by the applicant have been verified and found to be accurate and correct. Additional calculations for the corrected hazardous air pollutant emissions and spray gun emission calculations are included in Appendix A (two pages).

Potential Emissions

Pursuant to 326 IAC 1-2-55, Potential Emissions are defined as "emissions of any one (1) pollutant which would be emitted from a facility, if that facility were operated without the use of pollution control equipment unless such control equipment is necessary for the facility to produce its normal product or is integral to the normal operation of the facility."

Pollutant	Potential Emissions (tons/year)
PM	19.25
PM-10	-
SO ₂	-
VOC	46.81
CO	-
NO _x	-

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential Emissions (tons/year)
Dibutylphthalate	0.44
Napthalene	0.12
Methyl Ethyl Ketone	11.17
Toluene	1.80
Hexamethylene Diisocyanate	0.07
Ethylbenzene	0.07
Xylene	0.37
Methyl Isobutyl Ketone	0.26
TOTAL	14.30

- (a) The potential emissions (as defined in 326 IAC 1-2-55) of the single HAP Methyl Ethyl Ketone is equal to or greater than ten (10) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

No previous emission data has been received from the source.

Limited Potential to Emit

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units.

	Limited Potential to Emit (tons/year)							
Process/facility	PM	PM-10	SO ₂	VOC	CO	NO _x	Single HAP	Total HAPs
Four (4) Production Urethane Molding Units	0.39	-	-	46.81	-	-	9 (Methyl Ethyl Ketone)	12.13
Total Emissions	0.39	-	-	46.81	-	-	9	12.13

County Attainment Status

The source is located in Whitley County.

Pollutant	Status
TSP	attainment
PM-10	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Whitley County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

- (a) 40 CFR 60, Subpart Kb (Standards of Performance for Volatile Organic Liquid Storage Vessels)
The four (4) storage tanks are not subject to this rule because:
(1) their capacities are less than 40 cubic meters (28.39 cubic meters each); and
(2) they are not used to store volatile organic liquids (isocyanate and polyol resin).
- (b) There are no New Source Performance Standards (326 IAC 12) and 40 CFR Part 60 applicable to this facility.
- (c) There are no National Emission Standards for Hazardous Air Pollutants (40 CFR 61 and 63) applicable to this facility.

State Rule Applicability - Entire Source

326 IAC 2-1-3.4 (New Source Toxics Control)

The source is subject to this rule since it is a new construction of a major source of hazardous air pollutants (HAPs) with potential methyl ethyl ketone (MEK) emissions of 10 tons per year or more. The applicant has chosen to accept a MEK limitation of 9 tons per 12 month period, rolled on a monthly basis, for the source. This limitation is equivalent to 2.05 pounds of MEK per hour. Therefore, the applicant is not subject to 326 IAC 2-1-3.4 or MACT analysis (Maximum Achievable Control Technology).

326 IAC 2-6 (Emission Reporting)

This source is located in Whitley County and the potential to emit VOC is less than one hundred (100) tons per year. The source is not one of the twenty-eight (28) listed sources and its potential to emit PM₁₀ is less than one-hundred (100) tons per year including fugitive emissions, therefore, 326 IAC 2-6 does not apply.

The source will be required to annually submit a statement of the actual emissions of all federally regulated pollutants from the source, for the purpose of fee assessment.

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

- (a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings as determined by 326 IAC 5-1-4,
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 6-3 (PM process operation)

The source is subject to this rule for the PM overspray from the spray guns used in the urethane molding operation because no other 326 IAC 6 rules apply.

The surface coating booths shall comply with 326 IAC 6-3-2(c) using the following equation:

$$E = 4.10P^{0.67} \quad \text{where: } E = \text{rate of emission in pounds per hour,}$$

P = process weight in tons per hour, if
P is equal to or less than 60,000 lbs/hr (30 tons/hr)

The surface coating booths comply with this rule by using dry filters as overspray control devices.

326 IAC 8-9 (Volatile Organic Liquid Storage Vessels)

The four (4) storage tanks are not subject to this rule because:

- (i) they are not located in Clark, Floyd, Lake, or Porter Counties; and
- (ii) they are not used to store volatile organic liquids (isocyanate and polyol resin).

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

The urethane injection molding facility is subject to this rule because it is a new facility (constructed after January 1, 1980) that has potential VOC emissions greater than 25 tons per year (46.81 tons per year) and it is not regulated by any other 326 IAC 8 rule. Pursuant to 326 IAC 8-1-6, the applicant shall reduce the VOC emissions from the urethane molding operation using best available control technology (BACT).

Best Available Control Technology (BACT) for VOC

Best Available Control Technology (BACT) analysis for the urethane molding facility, was submitted by Ms. Amy Lint of Dames & Moore on behalf of the company. BACT analysis was conducted in accordance with the "Top Down BACT Guidance from U.S. EPA." This analysis evaluated the feasibility of using the following: process modification, raw material reformulation and substitution, and add-on controls.

Process Modification

(1) Reaction Injection Molding Process

An U.S. EPA report Control of Volatile Organic Compound Emissions from Batch Processes - Alternate Control Techniques Information Document, dated February 1994, classifies the reaction injection molding (RIM) process that Autoliv proposes to utilize as a reactor batch process. According to this report, VOC emissions are present in most steps of the reactor batch process due to the volatility of raw materials used, therefore **process modification is technically infeasible and will not be evaluated further.**

Raw Material Reformulation and Substitution

(1) Substitution of Acetone for Methyl Ethyl Ketone

The Permittee has already substituted acetone for methyl ethyl ketone, reducing VOC and HAP emissions by 23 tons per year. Permittee is currently using known raw ingredients with the lowest VOC content possible that will produce a product that meets their quality control criteria. **Further raw material reformulation and substitution is technically infeasible and will not be evaluated further.**

Add-On Controls

(1) Carbon Absorption

This method of control involves the use of activated carbon to absorb the VOCs in the exhaust gas. Carbon absorption systems are best utilized on processes that have relatively low exhaust flow rates, homogeneous exhaust stream composition, and a high concentration of VOCs in the exhaust stream. Larger exhaust flow rates require a correspondingly larger amount of carbon. A non-homogeneous exhaust stream composition makes it difficult to predict the overall removal efficiency due to the varying adsorptive capacities and affinities of the VOCs. There are also disposal considerations for carbon absorption systems. Disposal of the spent carbon, which could be classified as a hazardous waste, would shift the pollutant waste from one media to another. There are regenerative carbon absorption systems which require steam stripping or incineration to remove the absorbed VOCs from the carbon. However non-homogeneous composition of the exhaust stream might render the method of steam stripping impossible to recover a usable product from the regenerative process. This is because steam stripping involves the recovery of the stripped solvents from the carbon and the recovered solvents would then have to be processed to separate each one from the recovered mixture. Because the proposed RIM process has a high exhaust flow rate, a non-homogeneous exhaust composition, and a low VOC concentration, **carbon absorption is technically infeasible and will not be evaluated further.**

(2) Incineration

This method of control involves the elevation of temperature in the exhaust stream to combust any VOCs that are present. There are three different types of incineration, direct flame, catalytic, and regenerative. Direct flame incineration, also referred to as thermal oxidation, exhausts the waste stream through a flame with a minimum temperature of 1400°F to combust the VOCs. Catalytic incineration exhausts the waste stream through a catalyst bed (i.e. platinum) which increases the speed at which the exothermic oxidation reaction occurs. This reaction generates enough heat to oxidize the VOCs in the waste stream at a temperature range of 600 - 700°F. Regenerative incineration involves the recapture of heat generated during the incineration process. Regenerative systems may use materials which absorb heat, such as ceramic packing, as a method of storing or transferring the heat for use elsewhere in the plant, or as a preheater for incineration. **These processes are technically feasible, and therefore will be evaluated further.**

(3) Condensation and Absorption

This method of control involves the lowering of the exhaust stream temperature to condense the VOCs and/or the absorption of the VOCs on a compatible absorbent. Condensation and absorption systems are best utilized on processes that have relatively low exhaust flow rates, homogeneous exhaust stream composition, and a high concentration of VOCs in the exhaust stream. Condensation may be achieved by the use of a heat exchange refrigeration system. Absorbents must be properly disposed of or regenerated. Recovery of the spent solvents will be difficult through regeneration due to the non-homogeneous nature of the exhaust stream. Disposal would cause the possibly hazardous absorbents to be shifted to another medium. Because the proposed RIM process has a high exhaust flow rate, a non-homogeneous exhaust composition, and a low VOC concentration, **the method of condensation and absorption is technically infeasible and will not be evaluated further.**

Environmental Impacts

- (1) The following table summarizes the environmental impacts in tons per year of the options that were determined to be technically feasible.

Emission Factor (lb/MMCF)	PM = PM10 (12)	SO ₂ (0.60)	NO _x (100)	VOC (5.30)	CO (21)
Direct Flame Incineration	0.2	0	2.0	0.1	0.4
Catalytic Incineration	0.1	0	1.0	0.1	0.2
Regenerative Incineration	0.5	0	3.9	0.2	0.8

Cost Analysis

Control Option	Control Efficiency	VOC Emissions (tons/year)	VOC Emission Reduction (tons/year)	VOC After Control (tons/year)	\$ per ton VOC removed	Energy Impacts (MMBtu/hr)
Direct Flame Incineration	95%	46.81	44.47	2.34	16,010	4.640
Catalytic Incineration	96%	46.81	44.94	1.87	17,580	2.200
Regenerative Incineration	99%	46.81	46.34	0.47	17,240	8.882
No Add-on Control	0%	46.81	0	46.81	0	0

Methodology:

Total Capital Cost = Direct Capital Cost + Indirect Capital Cost

Total Annual Operating Cost = Direct Annual Cost + Indirect Annual Cost

\$ per ton of VOC Removed = Total Annual Operating Cost / VOC Emission Reduction

The breakdown of the costs are as follows:

- (1) Direct Capital Cost: purchased equipment cost including ductwork and instrumentation; direct installation cost including foundations, support, electrical, and painting;
- (2) Indirect Capital Cost: engineering, construction and field expenses, contractor fees, performance testing, contingencies, and startup;
- (3) Direct Annual Cost: operating labor, maintenance, and utilities; and
- (4) Indirect Annual Cost: overhead, property tax, insurance, and capital recovery.

Control Option	Direct Capital Cost (\$)	Indirect Capital Cost (\$)	Total Capital Cost (\$)	Direct Annual Cost (\$)	Indirect Annual Cost (\$)	Total Annual Cost (\$)	VOC Removed (tons)	\$ per ton of VOC Removed
Direct Flame Incineration	1,763,000	173,000	1,936,000	295,000	102,000	712,000	44.47	16,010
Catalytic Incineration	2,531,000	454,000	2,985,000	167,000	623,000	790,000	44.94	17,580
Regenerative Incineration	1,537,000	164,000	1,701,000	437,000	362,000	799,000	46.34	17,240
No Add-on Control	0	0	0	0	0	0	0	0

Summary of BACT Analysis:

There are three technically feasible options that can be applied to the Autoliv ASP urethane injection molding process operation:

- (1) Direct Flame Incineration:

This technically feasible option has a 95% overall destruction efficiency. However, the company rejected this option as cost prohibitive at \$16,010 per ton of VOC removed. This data was evaluated and it was determined that **this control option's annualized cost is excessive.**

- (2) Catalytic Incineration:

This technically feasible option has a 96% overall destruction efficiency. However, the company rejected this option as cost prohibitive at \$17,580 per ton of VOC removed. This data was evaluated and it was determined that **this control option's annualized cost is excessive.**

- (3) Regenerative Incineration:

This technically feasible option has a 99% overall destruction efficiency. However, the company rejected this option as cost prohibitive at \$17,240 per ton of VOC removed. This data was evaluated and it was determined that **this control option's annualized cost is excessive.**

BACT Determination for VOC:

The BACT determined is the following:

- (a) The VOC content of each ingredient used in the urethane injection molding units shall not exceed 8.3 pounds of VOC per gallon as applied.
- (b) The following pollution prevention techniques shall be applied:
 - (i) the method of application shall be air atomization spraying at a maximum pressure of 15 psi;
 - (ii) spraying shall be conducted at a maximum of 18 inches from the molds;
 - (iii) monitoring of the pressure differential across the overspray filter shall be continuous;
 - (iv) the spray guns applying the mold release agent and paint blend are the type that can be cleaned without the need for spraying the solvent into the air;
 - (v) all solvent sprayed during cleanup or color changes shall be directed into containers, such containers shall be closed as soon as solvent spraying is complete and the waste solvent shall be disposed of in such a manner that evaporation is minimized;
 - (vi) storage containers used to store VOC containing materials shall be kept covered when not in use;
 - (vii) cleanup rags saturated with solvent shall be stored, transported, and disposed of in containers that are closed tightly;
 - (viii) proper equipment clean-up and maintenance; and
 - (ix) proper testing of spray guns prior to daily use;
- (c) The VOC input to the urethane injection molding facility shall be limited to 46.81 tons per 12 month period (10.68 lb/hr), rolled on a monthly basis, based on 100% volatilization of the mold release agent, mold cleaner, paint blend, and adhesive.
- (d) Acetone shall be substituted for methyl ethyl ketone in the paint blend.
- (e) The BACT shall be reopened and reevaluated if another similar operation is going to be installed at the source. BACT will be evaluated for the operations together to determine if the cost is feasible.

Air Toxics Emissions and Analysis

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Construction Permit Application Form Y.

- (a) This source will emit levels of air toxics less than those which constitute a major source according to Section 112 of the 1990 Clean Air Act Amendments.
- (b) See attached calculations for detailed air toxic calculations (Appendix A, page 2 of 2).

The concentrations of these air toxics were modeled and found to be, in the worst case possible, as follows. The concentrations of these air toxics were compared to the Permissible Exposure Limits (PEL) developed by the Occupational Safety and Health Administration (OSHA).

Substance	Modeled Concentration	%OSHA PEL
Hexamethylene Diisocyanate	0.35 µg/m ³	1.00
All Other HAPs	-----	< 0.04

Conclusion

The operation of this automobile steering wheel manufacturing plant shall be subject to the conditions of the attached proposed **Federally Enforcable State Operating Permit No. F183-9405-00029**.

**Indiana Department of Environmental Management
Office of Air Management**

Addendum to the
Technical Support Document for Federally Enforceable State Operating Permit (FESOP)

**Autoliv, ASP
4868 East Park 30 Drive
Columbia City, IN 46725**

F-183-9405, Plt ID-183-00029

On May 27, 1998, the Office of Air Management (OAM) had a notice published in the Columbia City Post-Mail, Columbia City, Indiana, stating that Autoliv, ASP had applied for a Federally Enforceable State Operating Permit (FESOP) to operate an automobile steering wheel manufacturing plant with dry filters for control. The notice also stated that OAM proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On June 29, 1998, Dames & Moore submitted comments on behalf of Autoliv, ASP concerning the proposed FESOP. The summary of the comments is as follows:

Comment 1: Page 4 of 34, Section A, Condition A.1
The actual mailing address of the facility should be listed as 4868 East Park 30 Drive, Columbia City, IN 46725.

Response 1: At the request of the applicant, Condition No. A.1 shall be revised as follows:

The Permittee owns and operates an automobile steering wheel manufacturing plant.

Responsible Official:	Ervin L. Glass
Source Address:	4868 East Park 30 Drive, Columbia City, IN 46725
Mailing Address:	3350 Airport Road, Ogden, UT 84405 4868 East Park 30 Drive, Columbia City, IN 46725
SIC Code:	3714
County Location:	Whitley
County Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD Rules; Major Source, Section 112 of the Clean Air Act

Comment 2: Page 4 of 34, Section A, Condition A.2 (1)(ii)
The number of air atomization spray guns per urethane molding unit should be listed as twelve (12) instead of two (2).

Response 2: At the request of the applicant, Condition No. A.2 (1)(ii) shall be revised as follows:

This stationary source consists of the following emission units and pollution control devices:

- (1) four (4) production urethane molding units, identified as UM-1, UM-2, UM-3, and UM-4, each with:
 - (i) maximum capacities of 43 automobile steering wheels per hour;
 - (ii) ~~two (2)~~ **twelve (12)** air atomization spray guns, ~~one six~~ guns spray coating a paint blend at a rate of 1.81 gallons per hour and ~~one six~~ guns spray coating mold release agent at a rate of 0.70 gallons per hour;
 - (iii) three (3) pairs of molds; and
 - (iv) three (3) exhaust cabinets, controlled by dry filters and exhausting to stacks V-1, V-2, V-3, and V-4, respectively.

The addition of these air atomization spray guns will not cause an emissions increase from the information that was previously submitted. This change will also be made in the facility description box of section D.1 and in the New Emission Units and Pollution Control Equipment Requiring ENSR section of the Technical Support Document.

Comment 3: Page 26 of 34, Section D, Condition D.1.1 (d)
Acetone has been substituted for MEK in the pure form to be added to the paint blend. MEK will still be present in other products used at the facility.

Response 3: The Office of Air Management agrees with the proposed comment. Condition D.1.1 (d) is revised as follows:

- (d) Acetone shall ~~be~~ **remain** substituted for ~~the pure~~ methyl ethyl ketone in the paint blend.

Upon further review, OAM has made the following changes (changes are bolded for emphasis):

Comment 4: Page 4 of 34, Section A, Source Summary shall be revised as follows:

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM), ~~and presented in the permit application.~~ **The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.**

Comment 5: Page 7 of 34, Section B, Condition B.8 (c) shall be revised as follows:

- (c) Upon request, the Permittee shall also furnish to IDEM, OAM copies of records required to be kept by this permit. **If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, For information claimed to be confidential, the Permittee shall must furnish such records to IDEM, OAM, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, the Permittee shall must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.**

Comment 6: Page 8 of 34, Section B, Condition B.12 (c) shall be revised as follows:

- (c) The annual compliance certification report shall include the following:
 - (1) The identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was **based on** continuous or intermittent **data**;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts as specified in Sections D of this permit, IDEM, OAM, may require to determine the compliance status of the source.

Comment 7: Page 8 of 34, Section B, Condition B.13 shall be revised as follows:

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each **facility**:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing ~~emission units and associated~~ emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

**Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015**

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM.

Comment 8: Page 10 of 34, Section B, the end of Condition B.14 (b)(5) shall be revised as follows:

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1~~(33)~~ **(34)**.

Comment 9: Page 10 of 34, Section B, Condition B.15 shall be revised as follows:

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:**

- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or**
- (2) An emergency as defined in 326 IAC 2-7-1(12); or**
- (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.**
- (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.**

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- ~~(b)~~ **(c)** Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. **The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).**
- ~~(c)~~ **(d)** Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

Comment 10: Page 11 of 34, Section B, Condition B.17 (a) shall be revised as follows:

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) **and 326 IAC 2-7-1(40).**

Comment 11: Page 12 and 13 of 34, Section B, Conditions B.18, B.19, and B.20 shall be combined into one condition numbered B.18 as follows:

B.18 Permit Amendment or Modification [326 IAC 2-8-10] [326 IAC 2-8-11]

- (a) **The Permittee must comply with the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11 whenever the Permittee seeks to amend or modify this permit.**
- (b) **Any application requesting an amendment or modification of this permit shall be submitted to:**

**Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015**

Any such application should be certified by the “responsible official” as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule.
- (c) **The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]**

The remainder of section B shall be renumbered accordingly.

Comment 12: Page 14 of 34, Section B, the end of Condition B.23 (b) (now B.21 (b)) shall be revised as follows:

The notification which shall be submitted by the Permittee does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(~~33~~) **(34)**.

Comment 13: Page 15 of 34, Section B, Condition B.25 (e) (now B.23 (e)) shall be revised as follows:

- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements. [326 IAC 2-8-5(a)(4)]

- (1) **The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, nor an authorized representative, may disclose the information unless and until IDEM, OAM makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]**
- (2) **The Permittee and IDEM, OAM, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]**

Comment 14: Page 15 of 34, Section B, Condition B.26 (b) (now B.24 (b)) shall be revised as follows:

- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-8-10. **The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**

Comment 15: Page 15 of 34, Section B, Condition B.27 (now B.25) shall be revised as follows:

- (a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing, ~~or in a time period consistent with the fee schedule established in 326 IAC 2-8-16.~~ **If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.**
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) ~~If the Permittee does not receive a bill from IDEM, OAM, thirty (30) calendar days before the due date,~~ The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee. ~~The applicable fee is due April 1 of each year.~~

Comment 16: Page 17 of 34, Section C, Condition C.1 (b) shall be revised as follows:

- (b) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does **not** exceed the above specified limits.

Comment 17: Page 18 of 34, Section C, Condition C.7 shall be revised as follows:

All air pollution control equipment listed in this permit **and used to comply with an applicable requirement** shall be operated at all times that the emission units vented to the control equipment are in operation. ~~as described in Section D of this permit.~~

Comment 18: Page 18 and 19 of 34, Section C, Conditions C.8 and C.13 shall be combined into one condition numbered C.8 as follows:

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

- (f) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

The remainder of section C shall be renumbered accordingly.

Comment 19: Page 18 of 34, Section C, Condition C.9 shall be revised as follows:

C.9 Performance Testing ~~[326 IAC 3-2.1]~~ [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC ~~3-2.1~~ **3-6** (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days ~~before~~ **prior to** the intended test date. **The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.**

- (b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Comment 20: Page 19 of 34, Section C, Condition C.10 shall be revised as follows:

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee **may extend compliance schedule an additional ninety (90) days provided the Permittee shall** notify:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, **prior to the end of the initial ninety (90) day compliance schedule** ~~no more than ninety (90) days after receipt of this permit, with full justification of the reasons for the inability to meet this date. and a schedule which it expects to meet. If a denial of the request is not received before the monitoring is fully implemented, the schedule shall be deemed approved.~~

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Comment 21: Page 19 of 34, Section C, Condition C.12 shall be revised as follows:

Any monitoring or testing performed to meet the **applicable** requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

Comment 22: Page 20 of 34, Section C, Condition C.14 (now C.13) shall be revised as follows:

If a regulated substance, subject to 40 CFR 68, is present **in a process** in more than the threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

(a) Submit:

- (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
- (2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
- (3) A verification to IDEM, OAM that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.

(b) Provide annual certification to IDEM, OAM that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Comment 23: Page 21 of 34, Section C, the title of Condition C.15 (now C.14) shall be revised as follows:

C.14 Compliance Monitoring Plan - Failure to Take ~~Corrective Action~~ **Response Steps** [326 IAC 2-8-4(3)]**[326 IAC 2-8-5][326 IAC 1-6]**

Comment 24: Page 22 of 34, Section C, Condition C.16 (now C.15) shall be revised as follows:

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test **[326 IAC 2-8-4]**
[326 IAC 2-8-5]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Comment 25: Page 23 of 34, Section C, Condition C.18 (now C.17) shall be revised as follows:

C.17 General Record Keeping Requirements ~~[326 IAC 2-8-4(3)(B)]~~**[326 IAC 2-8-5]**

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location **for a minimum of three (3) years** and available **upon the request** ~~within one (1) hour upon verbal request of an IDEM, OAM representative, for a minimum of three (3) years. They~~ **The records** may be stored elsewhere for the remaining two (2) years **as long as they are available upon request** ~~providing they are made available within thirty (30) days after written request.~~ **If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.**

Comment 26: Page 24 of 34, Section C, Condition C.19 (now C.18) shall be revised as follows:

- (a) To affirm that the source has met all the **compliance monitoring** requirements stated in this permit the source shall submit a Quarterly Compliance **Monitoring** Report. Any deviation from the requirements and the date(s) of each deviation must be reported.
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.
- (e) All instances of deviations **as described in Section B- Deviations from Permit Requirements Conditions** must be clearly identified in such reports. ~~A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:~~
 - ~~(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or~~
 - ~~(2) An emergency as defined in 326 IAC 2-7-1(12); or~~
 - ~~(3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.~~
 - ~~(4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.~~

~~A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.~~
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Comment 27: Page 26 of 34, Section D, the facility description box in section D.1 shall be revised as follows:

Facility Description [326 IAC 2-8-4(10)]

four (4) production urethane molding units, identified as UM-1, UM-2, UM-3, and UM-4, each with:

- (i) maximum capacities of 43 automobile steering wheels per hour;
- (ii) two (2) air atomization spray guns, one gun spray coating a paint blend at a rate of 1.81 gallons per hour and one gun spray coating mold release agent at a rate of 0.70 gallons per hour;
- (iii) three (3) pairs of molds; and
- (iv) three (3) exhaust cabinets, controlled by dry filters and exhausting to stacks V-1, V-2, V-3, and V-4, respectively.

Comment 28: Page 26 of 34, Section D, Condition D.1.1 (a) shall be revised as follows:

- (a) The VOC content of ~~each ingredient~~ **the mold cleaner** used in the urethane injection molding units shall not exceed 8.30 pounds of VOC per gallon as applied **and the VOC content of each ingredient used in the paint blend shall not exceed 6.71 pounds of VOC per gallon as applied.**

Comment 29: Page 27 of 34, Section D, a new Condition No. D.1.5 shall be added as follows:

D.1.5 Testing Requirements [326 IAC 2-8-5(a)(1),(4)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

The remainder of section D shall be renumbered accordingly.

Comment 30: A new condition No. D.1.7 shall be added as follows:

D.1.7 VOC Emissions

Compliance with Condition D.1.1 shall be demonstrated at the end of each month based on the total volatile organic compound usage for the most recent 12 month period.

The remainder of section D shall be renumbered accordingly.

Comment 31: Page 15 of 34, Section D, Condition D.1.6 (now D.1.8) shall be revised as follows:

- (a) Monitoring of the pressure differential across the overspray filter shall be continuous while the booth is in operation. Failure to take response steps in accordance with Section C - Compliance Monitoring Requirements, shall be considered a violation of this permit.
- (b) Weekly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. Compliance response for this unit shall contain troubleshooting contingency and response steps for when ~~an overspray emission, evidence of overspray emission, or other abnormal emission~~ **a noticeable change in overspray emission, or evidence of overspray emission** is observed. Failure to take response steps

in accordance with Section C - Compliance Monitoring Requirements, shall be considered a violation of this permit.

- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Comment 32: The FESOP Certification form shall be revised as follows:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: Autoliv, ASP
Source Address: 4868 East Park 30 Drive, Columbia City, IN 46725
Mailing Address: 3350 Airport Road, Ogden, UT 84405
FESOP No.: F-183-9405-00029

**This certification shall be included when submitting monitoring, testing reports/results
or other documents as required by this permit.**

Please check what document is being certified:

9 Annual Compliance Certification Letter

~~9 Emergency/Deviation Occurrence Reporting Form~~

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

Comment 33: The Quarterly Compliance Monitoring Report form shall be revised as follows:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

~~Attach a signed certification to complete this report.~~

Comment 34: The Emergency/ Deviation Occurrence Reporting Form shall be revised as follows:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY COMPLIANCE MONITORING REPORT**

Source Name: Autoliv, ASP
Source Address: 4868 East Park 30 Drive, Columbia City, IN 46725
Mailing Address: 3350 Airport Road, Ogden, UT 84405
FESOP No.: F-183-9405-00029

Months: _____ to _____ Year: _____

This report is an affirmation that the source has met all the **compliance monitoring** requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the **compliance monitoring** requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify ~~zero in the column marked "No Deviations"~~ in the box marked **"No deviations occurred this reporting period"**.

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD LIST EACH COMPLIANCE MONITORING REQUIREMENT EXISTING FOR THIS SOURCE:

Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)	Number of Deviations	Date of each Deviations	No Deviations

Form Completed By: _____
Title/Position: _____
Date: _____
Phone: _____

~~Attach a signed certification to complete this report.~~

On March 20, 1998, Mr. Jamie P. Wesseler and Mr. Tom Stockamp sent a letter to the IDEM stating their concerns regarding volatile organic compounds (VOCs) and hazardous air pollutants (HAPs) that would be emitted by Autoliv. They were particularly concerned about air quality in the vicinity of a nearby school.

Because the IDEM had not proposed a decision regarding this permit, IDEM Commissioner Hamilton responded by informing Mssrs. Wesseler and Stockamp that they would receive notice of the beginning of the public comment period and copies of the documents related to the proposed permit. Commissioner Hamilton encouraged them to review the IDEM documents and then to contact the agency if there were additional concerns.

The standard permit-related documents were made available to Mssrs. Wesseler and Stockamp, as well as the general public during the proposed permit's comment period. These documents included a summary of the IDEM's review of the application and the proposed permit. The summary of the review provides information regarding the legal requirements for obtaining a permit and general information regarding environmental impact. Air quality modeling information was provided that shows that the increase in air pollutant concentrations at that property line will be very small. The concentrations farther away will be even smaller.

The procedures for commenting on the proposed permit and requesting a public hearing were also included in these documents. The IDEM received no comments during the comment period.

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations

Company Name: Autoliv ASP
Address City IN Zip: 4868 East Park 30 Drive, Columbia City, IN 46725
CP: 183-9405
Pit ID: 183-00029
Reviewer: Jon Albin
Date: 07/06/98

Material	Density (Lb/Gal)	Weight % Volatile (H2O& Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)		Maximum gallons per hour	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential ton/yr	lb VOC /gal solids	Transfer Efficiency
Paint Resin	8.8	50.27%	0.0%	50.3%	0.0%	49.73%	1.00000	0.780	4.43	4.43	3.46	83.00	15.15	12.74	8.92	15%
Polane Catalyst	8.0	44.56%	0.0%	44.6%	0.0%	53.99%	1.00000	0.230	3.56	3.56	0.82	19.65	3.59	3.79	6.59	15%
Polane Accelerator	7.0	95.44%	0.0%	95.4%	0.0%	3.58%	1.00000	0.020	6.71	6.71	0.13	3.22	0.59	0.02	187.41	15%
Mold Release Agent	6.5	84.00%	0.0%	84.0%	0.0%	30.00%	1.00000	0.696	5.47	5.47	3.80	91.32	16.67	2.70	18.23	15%

State Potential Emissions

Add worst case coating to all solvents

8.22 197.19 35.99 19.25

Particulate Controlled Emissions (98% efficient): 0.39

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

Page 2 of 2 TSD AppA

Company Name: Autoliv, ASP
Plant Location: 4868 East Park 30 Drive, Columbia City, IN 46725
County: Whitley
Permit Reviewer: Jon Akin
Date: 07/06/98

[illegible]

0.44	0.12	11.17	1.80	0.07	0.07	0.37	0.26
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Total HAPs: 14.29

$$\text{HAPS emission rate (tons/yr)} = \text{Density (lb/gal)} * \text{Gal of Material (gal/unit)} * \text{Maximum (unit/hr)} * \text{Weight \% HAP} * 8760 \text{ hrs/yr} * 1 \text{ ton}/2000 \text{ lbs}$$